

**ORIGINAL**

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Spartanburg County  
Grace Gilchrist Knie, Circuit Court Judge  
\_\_\_\_\_

SCOTTY M. BROWN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

**RECEIVED**  
DEC 19 2019  
S.C. SUPREME COURT

APPELLATE CASE NO. 2019-000770

\_\_\_\_\_  
**PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX**  
\_\_\_\_\_

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

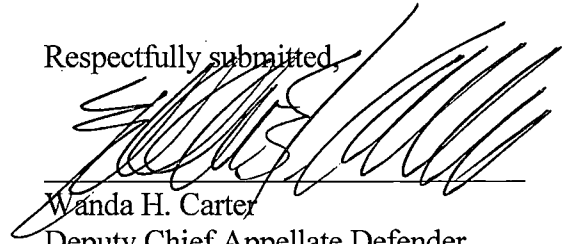
1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.

2. Counsel filed the brief of petitioner in the case of State v. Rhajon Akeem Reshae Sanders in the Supreme Court on December 2, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Ronnie Joe Blackwell v. State in the Supreme Court on November 27, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Sharkee Mitchell in Court of Appeals on November 27, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Derrick Miles in the Court of Appeals, November 22, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Patrick David Vaughn v. State in the Supreme Court on November 15, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Gowndell Cades v. State in the Supreme Court on November 7, 2019. Counsel had an oral argument in the case of Frederick Robert Chappell v. State in the Supreme Court on November 5, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Javonte Antonio Walls v. State with the Supreme Court on November 1, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Demetrius Simmons v. State with the Supreme Court on October 21, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sequoia McKinnon v. State with the Supreme Court on October 18, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kelvin Eugene Cohen v. State with the Supreme Court on October 3, 2019.

3. This request is made in good faith, and not for purposes of delay.

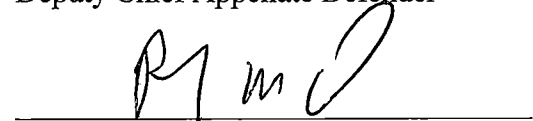
WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Wanda H. Carter  
Deputy Chief Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

December 19, 2019

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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PETITIONER,

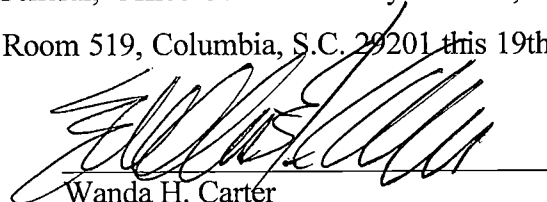
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Johnny E. James, Jr., Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 19th day of December, 2019.

  
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Wanda H. Carter  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 19th day of December, 2019.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: September 27, 2028.